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10 **UNITED STATES DISTRICT COURT**
11 **WESTERN DISTRICT OF WASHINGTON**
12 **AT TACOMA**

13 WILLIAM T. WHITMAN, individually and on
14 behalf of all others similarly situated,

15 Plaintiff,

16 v.

17 STATE FARM LIFE INSURANCE COMPANY,
18 an Illinois corporation

19 Defendant.
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No. 3:19-cv-06025-BJR

DECLARATION OF MARY JO HUDSON

1 I, Mary Jo Hudson, have personal knowledge of the information below and declare as follows:

2 1. I am over the age of 18. I am competent to testify. I make this Declaration based
3 upon personal knowledge.

4 2. I am the former Director of the Ohio Department of Insurance ("Director"), a
5 cabinet-level position that I held from 2007 to 2011, and that is the equivalent of the "Insurance
6 Commissioner" role in some states such as Washington. By virtue of that position, I served in a
7 number of national leadership capacities that focused specifically on life insurance product
8 regulation, solvency regulation, and market conduct regulation. I served in these positions through
9 the National Association of Insurance Commissioners ("NAIC") and the Interstate Insurance
10 Product Regulation Commission ("ICC"). I have served as an expert witness in matters involving
11 insurance markets.

12 3. Attached as **Exhibit A** is a true and correct copy of the March 29, 2021 report and
13 attachments that I prepared for the purposes of offering opinions in this matter. My report and its
14 attachments contain the bases for my opinions as well as my qualifications. The statements in the
15 report are true and correct to the best of my knowledge.

16 I declare under the penalty of perjury under the laws of the United States of America that
17 the foregoing is true and correct.

18 Executed this 29th of March, 2021 in Columbus, Franklin County, Ohio.

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22 Mary Jo Hudson